

FILED

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CLERK OF DISTRICT COURT OF CALIFORNIAHon. William McCurine, Jr.
BY: [Signature]

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Attorneys for Defendants City of San Diego; San Diego Police Department; City Attorney's
Office; Officer John Bailey; Sergeant Parga; Detective Catherine Millet; Officer Needham;
Officer S. Skinner; Detective L. Steward; Detective John Davis; Officer Ruben Hernandez;
Sergeant Alberto Leos; and, Lieutenant Brian Blagg

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

STEVE KASSAB,

Plaintiff,

v.

SAN DIEGO POLICE DEPARTMENT, a
municipal corporation, et al.,

Defendants.

Case No. 07cv1071 WQH (WMc)

STIPULATED PROTECTIVE ORDER

Per the ORDER ON PRODUCTION OF DOCUMENTS FOLLOWING *IN CAMERA*
REVIEW issued by Magistrate Judge William McCurine on September 19, 2008, the Defendants
are to disclose certain enumerated documents to Plaintiff. Further, the parties were ordered to
enter into a protective order governing the documents the Court has ordered to be disclosed. This
STIPULATED PROTECTIVE ORDER governs the documents the Court has ordered to be
disclosed.

IT IS HEREBY STIPULATED, BY AND BETWEEN THE PARTIES TO THIS
ACTION, AS FOLLOWS:

1. The documents to be produced by the Defendants incident to the Court's
September 19, 2008 ORDER ON PRODUCTION OF DOCUMENTS FOLLOWING *IN*
CAMERA REVIEW are identified in Exhibit A, attached hereto and incorporated herein by
reference.

1 2. Plaintiff, his agents, employees, attorneys and anyone acting in concert with him
2 and participating with him agree to not engage in nor perform any of the following:

- 3 a. Convey, transfer, copy, publish or distribute the information ordered
4 disclosed, or authorize another to convey, transfer, copy, publish or
5 distribute the information disclosed to anyone without prior Court
6 approval.
7 b. Use the records or information ordered disclosed for any purpose other
8 than in conjunction with the instant civil case proceedings pursuant to
9 applicable law.

10 3. Upon final disposition of this action, Plaintiff will return any and all materials
11 disclosed pursuant to the ORDER ON PRODUCTION OF DOCUMENTS FOLLOWING *IN*
12 *CAMERA REVIEW* issued by Magistrate Judge William McCurine September 19, 2008 to Daniel
13 F. Bamberg, Deputy City Attorney, or his designee, at 1200 Third Avenue, Suite 1100, San
14 Diego, California, immediately upon final disposition of this case.

15 4. That, upon the conclusion of this case, the Court shall retain jurisdiction to resolve
16 any disputes arising out the release of any documents protected by this order.

17 5. That the Court has the authority to modify, at any time, the terms of this protective
18 order on public policy grounds.

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1 6. That the documents identified in Exhibit A will be produced to the Plaintiff within
2 ten (10) calendar days after the Court signs this STIPULATED PROTECTIVE ORDER.

3 **IT SO STIPULATED.**

4 Dated: 10-21, 2008

MICHAEL J. AGUIRRE, City Attorney

By

D.F. Bamberg
DANIEL F. BAMBERG
Deputy City Attorney

Attorneys for Defendants

8
9 Dated: 10-21, 2008

Steve Kassab
STEVE KASSAB
Plaintiff In Pro Per

12 **APPROVED AND SO ORDERED:**

14 Dated: 10-21-08

W. Melusine Jr.
UNITED STATES MAGISTRATE JUDGE

EXHIBIT A**STIPULATED PROTECTIVE ORDER**

The documents listed below, as they were identified and bates stamped in the Defendants' Privilege Log that was lodged with Judge McCurine's chambers and served upon the Plaintiff on August 15, 2008, will be produced by the Defendants subject to the provisions of this Stipulated Protective Order.

CM-IA-00002	RH-SS-IA-00076 to RH-SS-IA-00085
CM-IA-00006 to CM-IA-00008	RH-SS-IA-00089 to RH-SS-IA-00101
CM-IA-00011 to CM-IA-00015	RH-SS-IA-00103 to RH-SS-IA-00104
CM-IA-00018 to CM-IA-00019	RH-SS-IA-00106 to RH-SS-IA-00108
CM-IA-00027 to CM-IA-00036	RH-SS-IA-00110
CM-IA-00040 to CM-IA-00054	RH-SS-IA-00113 to RH-SS-IA-00124
CM-IA-00056 to CM-IA-00057	RH-SS-IA-00133 to RH-SS-IA-00175
CM-IA-00061 to CM-IA-00066	RH-SS-IA-00214 to RH-SS-IA-00219
CM-IA-00208 to CM-IA-00251	RH-SS-IA-00222 to RH-SS-IA-00226
CM-IA-00254 to CM-IA-00266	RH-SS-IA-00228 to RH-SS-IA-00229
CM-IA-00274 to CM-IA-00293	RH-SS-IA-00231 to RH-SS-IA-00232
CM-IA-00295 to CM-IA-00318	RH-SS-IA-00236 to RH-SS-IA-00239
CM-IA-00341 to CM-IA-00343	
CM-IA-00357 to CM-IA-00362	
CM-IA-00365 to CM-IA-00369	
CM-IA-00372 to CM-IA-00373	
CM-IA-003765 to CM-IA-00376	
CM-IA-00380 to CM-IA-00381	
RH-SS-IA-00007 to RH-SS-IA-00051	
RH-SS-IA-00055 to RH-SS-IA-00057	
RH-SS-IA-00060 to RH-SS-IA-00063	
RH-SS-IA-00067 to RH-SS-IA-00070	

EXHIBIT A

STIPULATED PROTECTIVE ORDER

And all documents identified in Defendant's privilege logs as "Training Certificate,"
"Certificate of Completion" or "Certificate of Training."